

DECEMBER 2021



Incentive News

TENNCARE EHR PROVIDER INCENTIVE PAYMENT PROGRAM
A CMS "PROMOTING INTEROPERABILITY" PROGRAM

Reminders:

Information you may still need — and other items of interest to providers who participated in the EHR Incentive program — can still be found on the [TennCare EHR Incentive website](#).

We are now in the post-attestation period of TennCare's EHR Incentive program. No further attestations will be accepted.

Can We Help?

If you have lingering questions about the EHR Incentive Program as it begins to sunset, [contact us](#) Monday through Friday from 7:00 a.m. to 3:30 p.m. Central Time. When emailing, please include your provider's name(s) and NPI(s).

Delayed Security Risk Analyses Must Be Completed by Dec. 31

When you completed your 2021 EHR Incentive attestation, were you one of the providers who chose to delay your Security Risk Analysis (SRA), as allowed by CMS for this year?

Those who chose to delay their annual SRA until after attesting **must now complete** it by December 31. In turn, the SRA must be emailed by Jan. 31, 2022 to TennCare Audit at InternalAudit.TennCare@tn.gov. Use the subject line "2021 Security Risk Assessment". Failure to submit the SRA by January 31 **will** result in a post-payment audit of your 2021 attestation.

The Meaningful Use objective for the SRA is to "Protect electronic protected health information (ePHI) created or maintained by the certified EHR technology (CEHRT) through the implementation of appropriate technical capabilities." Providers must conduct or review the SRA in accordance with 45 CFR 164.308(a)(1), including:

- Address the security (to include encryption) of ePHI created or maintained by your CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and
- Implement security updates as necessary, and



- Correct identified security deficiencies as part of the eligible risk management process.

The SRA must also answer:

- Who completed the SRA?
- Was an inventory list prepared of all hardware and software that creates, receives, maintains or transmits ePHI?
- Has a final report and/or corrective action plan(s) been documented for all significant deficiencies noted during the SRA, including target dates for implementation?

Offices are to maintain the SRA in a folder, accompanied by all proper documentation, including an inventory list and a final report.



Do You Have Questions Remaining About

The EHR Incentive Program?

Past attestations?

Your Future with Electronic Health Records?

Email TennCare.EHRIncentive@tn.gov

Always include the Provider's Name and NPI when communicating with TennCare.

If Your Program Is Ending, Why Do You Still Want My Address?

Throughout the life of TennCare's EHR Incentive program, we've asked you to make sure we have your correct address. We've asked you for your up-to-date address, your recently changed address, and even your **EXACT** address. And once again, even as the program is soon to sunset, we are asking you to make sure your address is current in your CAQH and TennCare Provider Registration Portal profiles.

When you registered or updated your profile as a TennCare-participating provider through CAQH, you gave us your primary practice location. And if you were/are a member of a group with multiple locations, or you practice in multiple locations, you were asked to provide those additional locations as well. In order for TennCare to continue to identify where you practice and where you can receive some communications from us, it is important that we continue to have the most up-to-date address from you as possible.

To correct your address in CAQH and TennCare's Provider Registration Portal:

1. If you are an individual healthcare professional or sole proprietor, log into the CAQH Proview application (<https://proview.caqh.org/Login>). You can make changes to your primary practice location address by following the instructions there to update your profile records.

2. If you are group/entity, log into the TennCare Provider Registration Portal: <https://pdms.tennCare.tn.gov/Account/Login.aspx>

- Select **"update registration"**. Then select each link on the left side of the screen from the Identification section through the Agreements section. Review information in each section and select "save", then "next". In the Practice Locations section, select the edit icon on the far right after the Primary Practice Address. In the next box, edit the address to match as needed. Finally, select "Submit to TennCare". For assistance, please contact Provider.Registration@tn.gov.
- If you have additional practice locations listed and need to make changes, or have practice locations to add, scroll down the page and follow the same steps as above.

While it is not mandatory for TennCare participation, it is also recommended that you make any CAQH and TennCare Provider Registration Portal address changes at the CMS NPPES website as well. To do so, updates must be entered at the NPPES site, <https://nppes.cms.hhs.gov>.

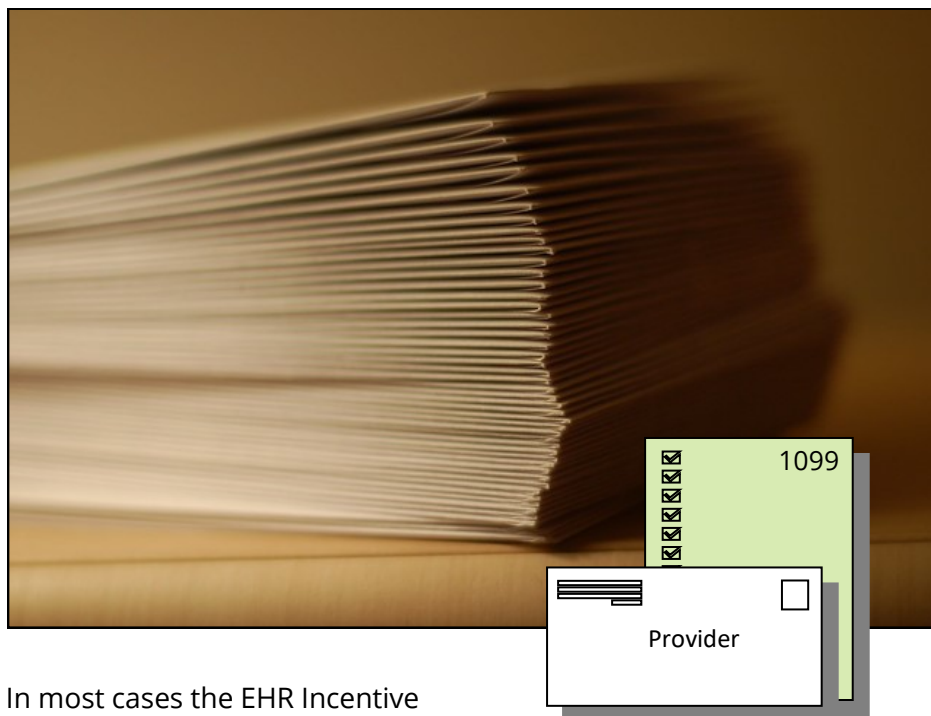
State to Issue 1099s for Individual EPs Who Received EHR Incentive Payments in 2021

The State of Tennessee will issue 1099s to individual Eligible Professionals (EPs) who have received EHR Incentive Payments during 2021. This will include payments for both 2020 and 2021. The mailing will occur by January 31, 2022.

IRS guidelines require the issuance of Form 1099 to the EP, however, EPs will again have the option to assign their EHR Incentive Payment to their Group Practice or Clinic. The payment can be designated to a different entity for each year of program participation, but cannot be divided during a single year of program participation.

The 1099 is an informational form that is also provided to the IRS. To determine if payments are taxable, you must consult your tax professional. The EP is responsible for selecting the appropriate option in the CMS Registration and Attestation System, whether the EP is to receive the EHR Incentive Payment or it is to be made to a designated Payee NPI (one with which the EP has a contractual relationship).

CMS, the Division of TennCare, and the EHR Provider Incentive Payment Program (PIPP) are not responsible for decision-making or mediation regarding the assignment of EHR Incentive Payments.



In most cases the EHR Incentive Payment itself is distributed to the group practice. When this occurs, it is the responsibility of the EP to report the payment on Form 1099-MISC to the employer or entity which bills for the EP's services. Contact your employer to obtain the tax ID number to be entered on the Form 1099-MISC.

Again, EPs are strongly encouraged to contact their tax professional on the proper handling of this matter.

EPs who lose their 1099 or otherwise need a replacement should contact F&A Accounts, Supplier Maintenance at F_A.Accounts@tn.gov. (There is an underscore [] between the F and the A.) In your message, please provide the tax year(s)

for which the 1099 is needed, Tax ID number, name, and either an email address, fax number, or current mailing address where the replacement 1099 can be sent.

Please note: F&A Accounts, Supplier Maintenance is NOT able to assist you with EHR Program-related questions. Questions about the EHR Incentive program should be sent only to TennCare.EHRIncentive@tn.gov.



Division of

TennCare

EHR Incentive News

DECEMBER 2021

Medicaid EPs and EHs should submit questions about the Medicaid Promoting Interoperability (PI) Program (in Tennessee also known as the TennCare EHR Provider Incentive Payment Program) to TennCare.EHRIncentive@tn.gov; including questions about

- Eligibility (first 4 attestation pages)
- Meaningful Use
- Clinical Quality Measures
- Program Participation

ALWAYS include the provider's name and NPI when contacting us. We will respond to your inquiry as quickly as possible.

Should you have issues with a CMS website, contact the QualityNet help desk for assistance at qnetsupport@hcqis.org or 1-866-288-8912.

View TennCare Medicaid EHR Incentive Program online assistance at

- [Program website](#)
- How-to [PowerPoint Presentations](#)
- [FAQs](#)
- [Acronyms & Glossary](#)
- [Previous issues](#) of EHR Incentive News

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Reminder: TennCare EHR Program Sunsets Dec. 31

TennCare's EHR Provider Incentive Payment Program is coming to an end. Per CMS Rules and Regulations, the last incentive payment must go out the door no later than Dec. 31, 2021.

So, what does all this mean to you? The TennCare EHR Provider Incentive Payment Program **will end** December 31, 2021, **EXCEPT** for audits, adjustments, and appeals (relating to audits & adjustments). Providers will no longer submit Meaningful Use (MU) data through attestations to the Division of TennCare. At present TennCare does not

anticipate requiring further reporting of MU by providers. Of course, CMS could change that at any time.

However, TennCare providers who are Medicare providers ARE required by CMS to continue MU reporting to Medicare. Providers should continue to monitor information from CMS regarding the requirements and timing of reporting.

While the introduction of certified Electronic Health Record technology (CEHRT) initially met some resistance, it is TennCare's hope that providers found that CEHRT

enhanced their practices and the care of their patients. The goals of the Medicaid EHR incentive program include better coordination of patient care to improve health outcomes and the sharing of information to improve health care quality, efficiency, and patient safety.

Many Tennessee citizens will also benefit. The hospitals and medical professionals who adopted a CEHRT are now equipped to provide their patients with a "traveling" record of their health picture, should they need it, when they need it.